



**APPALACHIAN
REGIONAL
COMMISSION**

*A Proud Past,
A New Vision*

July 28, 2014

Ms. Darlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Notice of Ex Parte Communications, GN Docket No. 13-5 and GN Docket No. 12-353

Dear Ms. Dortch:

On July 25, 2014, Mark DeFalco of the Appalachian Regional Commission met with Patrick Halley of the Wireline Competition Bureau to discuss the potential impacts the IP Transition may have on rural subscribers in Carbon Hill, Alabama during the second phase of the AT&T trials – and on all rural subscribers throughout the AT&T footprint once the IP Transition is launched on a national scale.

Of particular concern is the elimination of the landline connection to rural households and businesses. Many rural locations only have one wired connection – the phone connection. This is especially true in the more outlying areas that are outside the cable footprint. By eliminating this wired connection, there is almost no chance these locations will ever be served by a wireline based broadband provider. While we recognize LTE wireless service can be a reliable substitution for voice communication, wireless mobile broadband is not an equivalent and affordable substitute for a wireline broadband connection. Even if a DSL broadband service is currently not offered in some rural locations, removing the landline connection will assure it will never be offered. In Carbon Hill, in excess of 50% of the rural locations will lose their landline connection.

We recognize the need for providers to make adequate returns on their investments and this presents a unique challenge in rural areas. We also recognize the need to migrate away from the TDM network toward a IP based network that will provide more robust broadband and new service offerings. However, in light of the National Broadband Plan, it seems removing what may be the only wireline connection to rural subscribers is moving in the wrong direction.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket.

Sincerely,

Mark DeFalco
Manager – Telecom Initiative
Appalachian Regional Commission

CC: Patrick Halley